

IN THE UNITED STATES
DISTRICT COURT EASTERN
DISTRICT OF OKLAHOMA

Lamone M. Johnson,
Plaintiff,

v.

Dr. Sanders et al.,
Defendants,

FILED

APR 16 2020

PATRICIA KENNEY
Clerk, U.S. District Court

Deputy Clerk

CIV-19-269-JHP-RAW

MOTION TO
ORDER PRISON
OFFICIALS TO
ALLOW PLAINTIFF
TO CONDUCT
DISCOVERY

Plaintiff files this motion under
Fed. R. Civ. P. 56(f). In support of this
motion Plaintiff states the following:

- (1.) On 3-28-20 Plaintiff Ms. Johnson
went to suicide prevention because the
O.S.P. staff placed her in the cell with
a predator whom had 4 P.R.E.A. reports
filed on him in the past, and is also
known for sexually assaulting cell mates
and other prisoners as well as violent
behavior. Plaintiff told staff (prison officials)
that she did not feel safe in the cell
with the inmate, staff disregarded Plaintiff's

Pg 2

own safety views. Plaintiff was being consistently asked to do sexual favors by her cellmate. Plaintiff told staff that she felt suicidal to get out of the cell with the inmate whom was persistently pressing Plaintiff for sex. Plaintiff was not allowed her mail while on this watch.

(2.) Plaintiff was held on suicide watch at the Oklahoma State Penitentiary from Saturday (3-28-20) to the following Friday (4-3-20). Plaintiff was transferred to another facility (Joseph Harp Cor. Center) without notice. Ms. Johnson arrived at the facility on 4-3-20 approx: 11:40 AM where she was informed that she would be being placed in a Program "BMU" Behavior Management Unit, where Plaintiff would be locked down in a therapeutic cell for 15 weeks (5 steps) with 5 steps, each step is the number of weeks the Plaintiff would have to complete to get to the next step. for example: ~~the~~ step 1 is 1 week of good behavior then on the following Tuesday, Plaintiff would be on Step 2, where two weeks of good behavior is required for Step 3 to be obtained and so forth if continues all the way up to Step 5. These steps you gain back your privileges

u

Pg 3

Plaintiff is on step 1, where she is not allowed anything in her room until step 3 is obtained. Plaintiff can't have access to Pen or Paper while in her cell. Only for a hour when Plaintiff is outside her cell, she will receive Pen, ~~But~~ Paper, because she is supervised. Plaintiff needs to conduct discovery and obtain Affidavits from Witness Inmate Marquis Porter 786756. Plaintiff was entered into this Program against her will. Now her access to Courts rights are being "restricted".

(3)

Plaintiff asks this court to issue a Order Ordering Joseph Harp Correctional center to allow Plaintiff to have her Property (Exhibits, legal books,) ~~Pen~~ Pen and Paper inside her cell and ~~access~~ reasonable access to the Law library so that Plaintiff can conduct discovery, and have the clerk send any orders, decisions from 3-26-20 - 4-10-20. Wherefore, Plaintiff moves this court to issue a "Just order" Pursuant to Fed. Civ. R. P. 56(f) to allow Plaintiff to have her Property (Exhibits, legal books) Pen, Paper, envelopes inside her cell and reasonable access to the law library so Plaintiff can conduct discovery and have the clerk of this court resend ~~the~~ any previous orders

pg 4

decisions issued to the Plaintiff's new address, for this relief the Plaintiff does Pray,

With Respect, hope

Respectfully submitted

Lamone M. Johnson

4-9-20

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was placed in the Joseph Hall Corn. Center's mail box on 4-9-20 to the Clerk of the Court to send a copy to the Defendants Counsel Darrell L. Moore (Due to Not knowing the address) ON 4-9-20

6 Clerk of Eastern District of Oklahoma
P.O. Box 607
Muskogee, OK 74401

Lamone M. Johnson

4-9-20

Lamone M. Johnson 744047

J.H.C.C. S.M.H.U. - 1-107

P.O. Box 546

Lexington, OK 73051